

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LOUISETTE GEISS, SARAH ANN THOMAS (a/k/a SARAH ANN MASSE), MELISSA THOMPSON, MELISSA SAGEMILLER, NANNETTE MAY (f/k/a NANNETTE KLATT), KATHERINE KENDALL, ZOE BROCK, CAITLIN DULANY, LARISSA GOMES, and JANE DOE, individually and on behalf of all other similarly situated,

Plaintiffs,

v.

THE WEINSTEIN COMPANY HOLDINGS, LLC, MIRAMAX FILM NY, LLC, THE WALT DISNEY COMPANY, DISNEY ENTERPRISES, INC., BUENA VISTA INTERNATIONAL, INC., HARVEY WEINSTEIN, ROBERT WEINSTEIN, DIRK ZIFF, TIM SARNOFF, MARC LASRY, TARAK BEN AMMAR, LANCE MAEROV, RICHARD KOENIGSBERG, PAUL TUDOR JONES, JEFF SACKMAN, JAMES DOLAN, MICHAEL EISNER, IRWIN REITER, DAVID GLASSER, FRANK GIL, RICK SCHWARTZ, FABRIZIO LOMBARDO, MARK GILL, NANCY ASHBROOKE, BARBARA SCHNEEWEISS, MIRAMAX DOES 1-10, TALENT AGENCY DOES 1-100, and JOHN DOES 1-50, inclusive

Defendants.

17-cv-9554 (AKH-BCM)

**ORAL ARGUMENT  
REQUESTED**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Tarak Ben Ammar dated February 12, 2019 and the accompanying Memorandum of Law, defendant Tarak Ben Ammar (“Mr. Ben Ammar”), by and through his attorneys, Pillsbury Winthrop Shaw Pittman LLP, hereby moves this Court before the Honorable Alvin K. Hellerstein, in Courtroom 14D of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, on a date and a time designated by the Court, as follows:

(1) For dismissal of Plaintiffs’ First Amended Class Action Complaint [Dkt. 140] (the “FAC”) as against Mr. Ben Ammar based upon lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2);

(2) For dismissal of the FAC pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim;<sup>1</sup> and

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<sup>1</sup> Mr. Ben Ammar joins in, and incorporates by reference, Defendants’ Motion to Dismiss the First Amended Class Action Complaint filed on December 17, 2018 [Dkt. 199] by Defendants The Weinstein Company Holdings, LLC, Miramax Film NY, LLC, the Walt Disney Company, Disney Enterprises, Inc., Buena Vista International, Inc., Robert Weinstein, Dirk Ziff, Tim Sarnoff, Marc Lasry, Lance Maerov, Richard Koenigsberg, Paul Tudor Jones, Jeff Sackman, James Dolan, and Michael Eisner.

(3) For such other and further relief as the Court may deem just and proper.

Dated: February 13, 2019

Respectfully submitted,

By: /s/ Kathy A. Jorrie  
Kathy A. Jorrie (admitted *pro hac vice*)  
(kathy.jorrie@pillsburylaw.com)  
Jeffrey D. Wexler (admitted *pro hac vice*)  
(jeffrey.wexler@pillsburylaw.com)  
PILLSBURY WINTHROP SHAW  
PITTMAN LLP  
725 S. Figueroa St., Suite 2800  
Los Angeles, California 90017-5406  
Telephone: (213) 488-7100  
Fax: (213) 629-1033

Matthew D. Stockwell  
(matthew.stockwell@pillsburylaw.com)  
PILLSBURY WINTHROP SHAW  
PITTMAN LLP  
1540 Broadway  
New York, New York 10035  
Telephone: (212) 858-1558  
Fax: (212) 858-1500

*Attorneys for Defendant Tarak Ben Ammar*